

## Exhibit F



**MILLER COHEN, P.L.C.**  
ATTORNEYS AND COUNSELORS AT LAW  
600 WEST LAFAYETTE BLVD.  
DETROIT, MICHIGAN 48226-0840  
(313) 964-4454

1. Plaintiff generally objects to each Definition, Instruction, and Interrogatory to the extent that they purport to impose a burden of ascertaining information that is not available to Plaintiff or within her possession or control, or is equally and/or already available to Defendant.

2. Plaintiff generally objects to each Definition, Instruction, and Interrogatory to the extent that they call for the discovery of information subject to a claim of privilege or immunity, including, without limitation, the attorney-client or work-product privilege.

3. Plaintiff generally objects to each Definition, Instruction, and Interrogatory to the extent that they purport to impose on Plaintiff requirements beyond those authorized by the Federal Court Rules.

4. Plaintiff generally objects to each Definition, Instruction, and Request to the extent that they purport to impose a burden of ascertaining information that is not available to Plaintiff or within her possession, custody or control.

5. Plaintiff generally objects to each Definition, Instruction, and Request because Defendant is seeking documents that are not specifically described, where the request is vague and ambiguous.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 1**

For any individuals, including doctors, psychologists, social workers, medical personnel, or other care givers, who have examined or treated you for any illness, injury, or condition you allege in the Complaint that you suffered as a result of the alleged conduct of the Defendant, please:

- a. State the name and address and specialty, if any, of the individual(s) who examined or treated you;

- b. State the specific illness or condition that was treated; and
- c. State the dates and type of examination and/or treatment.

For each and every medical practitioner, psychologist, counselor, social worker, or care giver listed above, please complete, sign, and return with your answers to these Interrogatories an Authorization for the Release and Disclosure of Medical Records and Protected Health Information and an Authorization for the Release and Disclosure of Psychotherapy Notes. (Attached hereto are Authorizations for your use. If additional Authorizations are needed, you may make copies of the form for your use.)

**ANSWER TO INTERROGATORY NO. 1**

Objection. Defendant's Interrogatory calls for Plaintiff to divulge sensitive information that is not likely to be relevant. Plaintiff has provided Defendant with a proposed protective order, but has not received a response as of the date of Plaintiff's Response. Plaintiff will supplement this response and provide Defendant with the information requested, but only after a protective order has been entered by the court.

**SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 1**

Subject to the foregoing General Objections, Plaintiff reserves the right to supplement and answers as follows:

- a. Dr. Reza Kahnamouei  
43301 Commons Dr.  
Clinton Township, MI 48048  
(586) 745-3006
- b. anxiety, major depression, and post-traumatic stress disorder
- c. I cannot recall exact dates, but I was told by my primary care physician that I suffered from the above. He took me off work for five days and provided the following

prescription medication: Paxil and Xanax. I was referred to a psychiatrist, but I have lost my medical insurance and cannot afford to seek further treatment.

**INTERROGATORY NO. 4**

With the exception of your employment with Defendant, identify each and every employment you have had from 2009 to the present, and for each employment identify:

- a. The name and address of the employer;
- b. The dates of employment; and
- c. Whether you are presently employed and, if not, the reason.

For each and every employer listed above, please complete, sign, and return with your answers to these interrogatories an Authorization for the Release and Disclosure of Employment Records. (Attached hereto is an Authorization for your use. If additional Authorizations are needed, you may make copies of the form for your use.)

**ANSWER TO INTERROGATORY NO. 4**

Objection. Defendant's Interrogatory is not calculated to lead to relevant information, is overly broad, and unduly burdensome. Plaintiff further puts Defendant on notice that if Defendant unilaterally contacts any subsequent employer or prospective employer and puts them on notice of this action without seeking the information through less intrusive means, Plaintiff believes such an act as a retaliatory act and will seek recourse for such retaliatory act. Plaintiff reserves the right to supplement this answer in accordance with subsequently discovered or developed information. In the spirit of discovery, subject to and without waiving the foregoing objection and Plaintiff's General Objections, Plaintiff answers as follows:

These documents were lost in a flood. I worked at Right at Home in Sterling Heights, but I do not possess records or recall the dates anymore. I left employment there to start work at Henry

Ford. Currently, I work at Davis Smith Inc.. My start date was June 11, 2014. Please see attached documents.

**SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 4**

Subject to the foregoing General Objections, Plaintiff reserves the right to supplement and answers as follows:

After Plaintiff lost her home, she was forced to leave Davis Smith Inc. and relocate on December 31, 2014. She has recently accepted employment with Leelin Home Health Care on January 15, 2015 located at 352 E Houghton Ave., West Branch, MI 48661.

**INTERROGATORY NO. 5**

Identify each and every employment application you have submitted from 2009 to the present, and for each such application identify:

- a. The name and address of the prospective employer;
- b. The dates of any applications; and
- c. A description of the response you received, if any, and the identity of the person who provided you with a response.

For each and every employer listed above, please complete, sign, and return with your answers to these Interrogatories an Authorization for the Release and Disclosure of Employment Records. (Attached hereto is an Authorization for your use. If additional Authorizations are needed, you may make copies of the form for your use.)

**ANSWER TO INTERROGATORY NO. 5**

Objection. Defendant's Interrogatory is not calculated to lead to relevant information, is overly broad, and unduly burdensome. Plaintiff further puts Defendant on notice that if Defendant unilaterally contacts any subsequent employer or prospective employer and puts them on notice

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of this action without seeking the information through less intrusive means, Plaintiff believes such an act as a retaliatory act and will seek recourse for such retaliatory act. Plaintiff reserves the right to supplement this answer in accordance with subsequently discovered or developed information. In the spirit of discovery, subject to and without waiving the foregoing objection and Plaintiff's General Objections, Plaintiff answers as follows:

Please see the attached documents attached.

**SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 5**

Subject to the foregoing General Objections, Plaintiff reserves the right to supplement and answers as follows:

See Plaintiff's Supplemental Response to Interrogatory No. 4 above.

Respectfully submitted,

**MILLER COHEN, P.L.C.**

By:



Keith D. Flynn (P74192)

*Attorney for Plaintiff*

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Dated: February 5, 2015

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

NATALIE REESER,

Plaintiff,

Hon. George Caram Steeh  
Case No. 2:14-cv-11916

v.

HENRY FORD HOSPITAL,

Defendant.

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**MILLER COHEN, P.L.C.**  
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**PROOF OF SERVICE**

DIANE BOXIE, an employee of MILLER COHEN, P.L.C., says that on *February 5, 2015*, she served **PLAINTIFF'S SUPPLEMENTAL ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES TO PLAINTIFF**, along with this *Proof of Service*, upon:

**VARNUM LLP**  
Mr. Terrence J. Miglio  
Ms. Barbara E. Buchanan  
39500 High Pointe Blvd., Suite 350  
Novi, MI 48375

via *U.S. First-Class Mail* by enclosing the same in a sealed envelope with postage fully prepaid, and by depositing the same in the United States Postal Receptacle in Detroit, Michigan.

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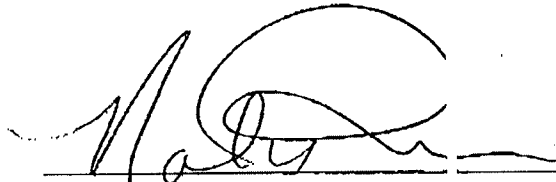
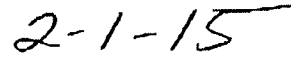
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**VERIFICATION**

I, Natalie Reeser, have reviewed the attached information, and have provided the answers to the best of my ability. These answers were prepared on the advice of counsel. The answers are what I could provide as of the date I signed below. I reserve the right to make any changes if more information becomes apparent, or if the answers provided could be more complete or accurate. These answers are true and accurate to the best of my ability.

  
Natalie Reeser  
Date